

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

ORIGINAL APPLICATION NO. 606 OF 2022

IN THE MATTER OF:

Public Action Co. & Ors.

.... Applicants

-Versus-

State of Punjab & Ors.

.... Respondents

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NDoH: 09.12.2024

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Date: 07.12.2024

Place: New Delhi

DRWAN AND FILED BY:



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ORIGINAL APPLICATION NO. 606 OF 2022

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PRELIMINARY REBUTTAL ON BEHALF OF THE RESPONDENT NO. 7, M/S MALBROS INTERNATIONAL PRIVATE LIMITED

MOST RESPECTFULLY SHEWETH:

1. That this Hon'ble Tribunal is presently seized of the above-captioned Original Application that has been initiated, albeit owing to extraneous considerations, against the distillery of the Respondent No. 7, M/s Malbros International Private Limited (hereinafter, 'Answering Respondent') situated at Village Mansoorwal, Tehsil Zira, District Ferozepur, Punjab. Specifically, the subject unit of the answering Respondent has been lawfully engaged in the distillation of spirits since 2007 with an initial capacity of 100 KLD, thereafter enhanced by another plant of 180 KLD capacity for manufacturing of Ethanol. Notably, post expansion, the Ethanol manufacturing began its commercial production from 03.02.2022 and supplied 75 lacs Bulk Litres of Ethanol per month to Oil Marketing Companies, but these operations were halted less than six months thereafter on 23.07.2022 due to a serious law and order situation at the premises of the subject unit of the answering Respondent.
2. That the instant case was last heard on 03.07.2024 when arguments were concluded by the Respondent No. 1, State of Punjab and the Respondent No. 5, Central Pollution Control Board and the case was next listed for rejoinder arguments on 18.07.2024. However, the case was adjourned in the Cause list to 09.08.2024 and then again to 21.10.2024.
3. That in view of the arguments so advanced by the Respondent No. 1, State of Punjab and the Respondent No. 5, Central Pollution Control Board on 03.07.2024, the answering Respondent seeks to place the present submissions as a Preliminary Rebuttal. The answering Respondent further seeks liberty of this Hon'ble Tribunal to comprehensively respond to the submissions made

against it by all parties in the form of a 'Written Submissions' after conclusion of the Rejoinder Arguments.

Rebuttal On Specific Issues raised thus far:

On Non-Furnishing of Documents

4. On the averment made by the Respondent No. 1 that the answering Respondent had not shared the documents sought by Respondent No. 2, Punjab Pollution Control Board ('PPCB') for furnishing the same to the Central Pollution Control Board as per a request made by CPCB vide letter dated 20.03.2023 (Letter @Pg. 522-523, Reply Affidavit of CPCB dated 19.05.2023) is completely denied as false and devoid of any merit. The answering Respondent had duly submitted all required documents, including the Environment Impact Assessment ('EIA') Reports, via a mail dated 03.10.2023 to the Chairman and Member Secretary of the Punjab Pollution Control Board ('PPCB'). A true copy of the mail dt. 03.10.2023 has been appended herewith as Annexure – R/1 (not on record).

Details of Borewells

5. That the details of borewells (location, depth, reasons for defunct and legacy borewells) along with water abstraction permissions were provided to the Respondent No. 2, PPCB, as well as the Environment Secretary, CPCB among others on several occasions. In fact the CGWA permissions dated 12.11.2007, 14.03.2016 and 10.06.2021 have been placed on record before this Hon'ble Tribunal by way of an IA No. 825 of 2023 (Pg. 2701-2776). Further, details of the location, depth, reasons for defunct and legacy borewells have been provided by the answering Respondent as below:
 - i. Letter from M/s Malbros Intl. Pvt. Ltd. to Regional Office, PPCB along with Compliance Chart (Annexure R-12/Pg. 452-454 of Reply to IA No. 262 of 2022 dated 20.02.2023 by answering Respondent);
 - ii. Status of all tubewells have been discussed at Para 30(ii)/Pg. 588-590 in IA No. 737 of 2023 dated 18.09.2023 filed by the answering Respondent. Further, Table 1 at Pg. 590 to 595 provides the details of all ten borewells in question along with details such as: Latitude and longitude of tubewell, landmark with regard to the location of the tubewell, depth of tubewell and submissions by the answering Respondent in respect of the tubewells as specified. This has been

reiterated in the Affidavit in Response dated 15.01.2024 filed by the answering Respondent to the Reply Affidavit of CPCB 23.11.2023 @Para 7/Pg. 3096;

- iii. Details of the ten borewells in question were yet again provided by the answering Respondent at Pg. 3274 of its IA No. 189 of 2024 dated 20.04.2024.

Further, intimation by the answering Respondent regarding closure of the defunct borewells had been made to the District Collector of Ferozepur on 31.05.2023 but no action has been taken by the District Administration till date. A true copy of the email dated 31.05.2023 has been appended herewith as Annexure R/2 (**not on record**).

NOC from CGWA

6. That the unit of the answering Respondent was granted the requisite NOC/permission to abstract groundwater since 2007 (CGWA permissions dated 12.11.2007, 14.03.2016 and 10.06.2021 have been placed on record before this Hon'ble Tribunal by way of an IA No. 825 of 2023/Pg. 2701-2776). This was delayed many times for all the industries in previous years and later renewed.

Politically Motivated actions

7. That the unit of the answering Respondent has been shut since 23.07.2022 due to protesting parties as well as the complacency of the State Government which is reflected through the pre-recorded message of the Hon'ble Chief Minister of Punjab dated 17.01.2023 that had been posted on Twitter and wherein he had declared to have taken the decision to close down the factory of the answering Respondent (Submission @Para 33/Pg. 238-239 of the Reply dated 20.02.2023 of the answering Respondent to the IA No. 262 of 2022). Clearly this is a case of "Confirmation Bias" since the Refusal to renew the Consent to Operate dated 03.02.2023 by the Respondent No. 2, PPCB as well as the Report of the Respondent No. 5, CPCB (Pg. 493-516 of Reply Affidavit dated 19.05.2023 of CPCB) are both events subsequent to the announcement dated 17.01.2023 made by the Hon'ble Chief Minister. It must, thus, be questioned whether the political pressure of the Hon'ble Chief Minister's tweet led the PPCB to contradict its earlier stand as per the Consents granted and renewed by it from time to time, despite the conditions remaining unchanged and the unit remaining closed since 23.07.2022.

This is the situation despite:

- i. Favourable findings from four separate inspections carried out by various Committees i.e. Report dated July, 2022 of the District Magistrate Joint Committee (**Pg. 33-39** of Status Report dated 21.10.2022 of the Joint Committee); Report dated 21.09.2022 of the NGT Monitoring Committee (**Pg. 40-124** of Status Report dated 21.10.2022 of the Joint Committee); Status Report dated 21.10.2022 of the Joint Committee formed by this Hon'ble Tribunal in the present case through Order dated 30.08.2022; and the Letter dated 19.09.2022 from Senior Medical Officer, Primary Health Centre, Kassoana to the Civil Surgeon, Firozpur (**Pg. 165-166 of e-mail dated 21.11.2022 titled "Document sent by Applicant to consider Annexure 15 along with IA No. 262 of 2022 which is till Annexure 14"**). This is clearly indicative of the fact that the balance of convenience lies in favour of the answering Respondent.
- ii. In fact, the Hon'ble High Court of Punjab and Haryana has penalized the Government of Punjab for a total of Rs. 20 Cr for the suffering sustained by the industry in the pending CWP No. 16500 of 2022 titled M/s Malbros International Private Limited & Another v. State of Punjab & Others (Refer **Order dated 22.11.2022 of the Punjab and Haryana High Court @Pg. 172-201** of Reply dated 18.02.2023 of the Respondent No. 2 & 3, PPCB). Furthermore, it is apparent from the Order dated 23.12.2022 of the Hon'ble High Court of Punjab and Haryana (**@Pg. 202-205 of the Reply dated 18.02.2023** of Respondent No. 2 & 3, PPCB) that the State of Punjab has chosen to pacify the protesting parties by parallelly constituting four Committees along with the politically motivated Report dated 12.04.2023 of the Respondent No. 5, CPCB. The above reflect the malafide intentions of the State of Punjab in respect of the unit of the answering Respondent.

No Appeals from GOP on findings

8. That the Respondent No. 1, State of Punjab, has never disputed the findings of any of the Reports furnished in favour of the answering Respondent despite having even been a party to the instant proceedings since the Report dated 21.10.2022 had been filed by the Respondent Nos. 2 & 3, PPCB on behalf of the Joint Committee constituted by this Hon'ble Tribunal vide Order dated 30.08.2022. It is only now after a period of about two years that the

Government of Punjab has suddenly shown suspicions at the final stages of the instant proceedings.

Hon'ble High Court records admitted position of compliant industry

That the Hon'ble High Court had passed a detailed Order on 22.11.2022 (**Order @Pg. 172-201** of Reply dated 18.02.2023 of the Respondent No. 2 & 3, PPCB) whereby the Government of Punjab admitted that the installation, commencement, and operations of the unit are not in violation of the law (**Rel. Pg. 188**).

Reverse Boring has been rejected by Monitoring Committee

9. That the contention regarding reverse boring has already been rejected by the NGT Monitoring Committee Report dated 21.09.2022 (**Pg. 40-124** of Status Report dated 21.10.2022 of the Joint Committee). In the absence of any direct evidence, no such attribution can be levelled against the answering Respondent. The Report of CPCB is only presumptive for flow of water, contamination, and cancer and other diseases.

Impossibility of Reverse Boring

10. That the Ld. Advocate General representing the Respondent No. 1 had pleaded that the answering Respondent was discharging 2090 m³ effluent water daily, which comes to 103.5 million m³ in last 15 yrs. He was unable to demonstrate how this effluent was pumped inside the ground through reverse boring, how many borewells were required to pump such a huge volume of effluents, and how many pumps of what horse power were required. Moreover, he was unable to demonstrate why it did not affect the nearby borewells in the vicinity and why people of the villages were not affected by cancer and hepatitis, as these diseases were not detected by Health Dept., Government of Punjab, Health Dept, CPCB, PPCB, CGWA, and how agriculture produce, animal milk has increased every year. This makes his statements false, presumptive and unscientific. By such large-scale pumping, the contaminated water must have crossed many states and this is an issue of national concern. In fact, the State of Punjab, PPCB, CPCB have never reported any contamination on inspecting the unit since its operation in 2007.

Periodic Renewal of Consent belies present stand of PPCB

11. The PPCB has continued renewing Consents every year, latest being on 12.11.2021 (**@Pg. 3295-3309 of IA No. 189 of 2024 dated 20.04.2024**), the CPCB also did not raise any such issues in its earlier visits over the years and the MoEF&CC granted an Environmental Clearance dated 15.01.2018 for expansion (**EC @Pg. 3289-3294 of IA No. 189 of 2024 dated 20.04.2024**). So, the allegations are bunch of lies and no fact, no evidence only politically motivated vendetta against the Industry.

Inconclusive CPCB Report

12. That the Respondent No. 5, CPCB has explicitly admitted at 10 occasions in its Report dated 12.04.2023 that further investigations are required (**Pg. 3268-3270 of IA No. 189 of 2024 dated 20.04.2024**).

Faulty sampling

13. That the answering Respondent has challenged the sampling u/s 21(1)(a) of Water Act, 1974 where the proper procedure for sampling was not undertaken by the Respondent No. 5, CPCB and the Water Committee of the Government of Punjab. Samples were not divided into two parts and the Water Committee constituted did not take consent from the answering Respondent. These samples are not legally tenable and cannot withstand in the Court of law. Despite this, the answering Respondent made comparisons reflecting the flaws and contradictions in its Reports. This clearly reflects the fair intentions of answering Respondent and malafide intent on the part of the Respondent No. 1, Government of Punjab. That the Report itself is highly objectionable as the Committee did not take consent of the industry as per the Form attached under the Sampling Procedure the same has already been under challenge. So, it has no legal status (**Para 4/Pg. 3094 of Reply Affidavit dated 15.01.2024 of answering Respondent r/w Para 16(iv), Pg. 3266 of IA No. 189/2024 dated 20.04.2024**).

GOP Water Committee Report inconclusive and also contradictory

14. That as per the Government of Punjab's Water Committee conclusion, "*There was no industrial activity since the last few months in the premises of the Malbros industry when the team was deputed to visit the site. Therefore, it is difficult to interpret the water pollution indicators in connection to Malbros Industry Nevertheless, industry specific parameters in accordance with*

literature reports were suggested by the team to check the water pollution. NABL accredited (3 nos.) laboratories were selected with due consultation with the Sanjha Morcha constituted by the Government. 'It is difficult to interpret water pollution results' so the report is unclear and not legal.' (Report @Annexure A/9 (Colly), Pg. 1747 – 1953 of IA No. 737/2023 dated 18.09.2023; Rel. Pg. 1751).

That in the absence of limited understanding of the manufacturing process of the ethanol industry and consumption of raw materials, the sources of toxic elements used by the industry could not be ascertained. This needs specialized expertise to check mass balance approach in the process flow diagram of ethanol production and other products of the industry. In this regard, it is submitted that despite having all data and relevant information, the PPCB did not provide the information to the Water Committee due to fear of revelation of truth. The fact that the sources of contamination could not be ascertained is a very serious statement by the Water Committee of Government of Punjab.

15. That contradicting analytical values of their own reports establishes that the methodology for taking samples was not correctly followed and it cannot be relied upon. As for high concentration of objectionable/toxic elements found in the soil, sample is taken from in front of biodigester. It has been analyzed by three different labs that are SAI lab, Patiala, Shriram Institute, Delhi & CSIR-IITR, Lucknow respectively. The results of these three labs are mentioned under:

Parameters	SAI Lab (ODB)	Shriram Institute	CSIR Lucknow
Mn mg/kg	426	326	145000
Cu mg/kg	27.8	25	1602
Pb mg/kg	50.7	Below Quantification Limit	16.6

No contamination pointed by District Water Supply Department

16. That surprisingly in all the 11 villages nearby or affected areas, no contamination was pointed by the District Water Supply Department. The tube wells in villages and reported water samples are within prescribed parameters. The presence of contamination or pollution a gap in Government of Punjab reports.

Specific Contentions against CPCB Report

17. That below are the specific points of contentions:

- I. As per the Site Assessment Study dated 31.10.2023 furnished by the PPCB (Pg. 2675-2678), pursuant to Order dated 26.09.2023 of this Hon'ble Tribunal, NEERI had twice attempted to carry out its inspections. However, on both these occasions they were unable to even enter the premises. This further inspection by NEERI has not been conducted till date.

- II. CPCB was unable to verify the direction of the ground water. This was contradicted by 4 Ex-Directors of CGWB hence the very important base of CPCB remained under cloud of doubt and suspicion. It is pertinent to note that as per the Report on Ground Water Flow prepared by D.S. Aqua Solutions, S.A.S. Nagar (Mohali) Punjab, the flow of direction of ground water flow is from North-Eastern part to South-Western part i.e. Zira to Sekhwan. This finding is corroborated by the Report dated October 2023 prepared by Akshat Ground Water Consultant Services which also notes that the flow of ground water is from the direction of ground water flow is from North East (Zira Village) to South West (Sekhwan Village) and therefore the ground water flow is away from Zira village.
A copy of the Report of D.S. Aqua Solutions is annexed at **Annexure A/5, Pg. 716-725 of IA No. 737/2023 dated 18.09.2023.**

Copy of Report of Akshat Ground Water Consultant Services is annexed at **Appendix A, Pg. 2632-2646 of IA No. 813/2023 dated 07.10.2023 of the present Respondent.**

- III. CPCB ignored the demography of the area where the main economic activity is agriculture which consumes 96% of total water.

- IV. CPCB ignored the facts that per hectare consumption of pesticides and chemical fertilizers in Punjab is highest in the country which is the main reason for water contamination.

- V. CPCB ignored the fact that the industry was consuming 1.5 % of total water, so the chances of water contamination was 64 times higher from the agriculture sector.
- VI. CPCB ignored the following published reports, provided by the industry, of Government of Punjab, CGWB, PAC, PGI, BARC, WB, Punjab Vidhan Sabha about prior presence of heavy metals in the entire area of Punjab (Zinc, Iron, Lead, Floride, Magnesium, Uranium, Cyanide etc.). These reports have been shared many times to all the agencies. 1525 villages across Punjab do not have clean drinking water for some or the other reason. To avoid the conflict with protestors due to political reasons, Government of Punjab has chosen best way out by refusal of consent. (**Refer Annual Water Quality Report FY 2021-22 of Department of Water Supply and sanitation, Government of Punjab. The same is annexed at Annexure A/6, Pg. 726 – 832 of IA No. 737/2023 dated 18.09.2023 of the present Respondent, Rel. Pg. 736).**)
- VII. CPCB deliberately ignored the fact that the villages near the factory do not have any STP plant causing huge drinking water problem during raining season when storm water mixes with agriculture runoff and human waste causing various types of serious diseases.
- VIII. CPCB ignored the fact that the death rate due to cancer is much lower in the area than the national average.
- IX. CPCB ignored the report of Department of Health that hepatitis is not caused by Industry. (**Refer Report of Health Committee which is annexed at Annexure A/9 (Colly), Pg. 1955-1976 of IA No. 737/2023 dated 18.09.2023).**)
- X. CPCB ignored the fact that that there is no fall in productivity of agriculture in the area.
- XI. CPCB failed to acknowledge that death caused to buffalos was due to ingesting toxic fertilizer nitrate in their green fodder by farmers.

- XII. CPCB kept silent that the CGWA team accompanying them during testing left the site early morning without conducting any test. The protestors did not allowed entry till 4 pm, and when an agreement was reached, they entered the premises and took a round in evening. Details of who made the ground water report is not confirmed.
- XIII. CPCB ignored the fact that cancer is quite prevalent in Malwa region predominantly due to the usage of pesticides in this region of Punjab. (Refer Research Article titled “An Assessment of Environmental Pollution and Policy Initiatives in Punjab, India: A Review” dated 22.07.2022 annexed at Annexure A/7, Pg. 833 – 842 of IA No. 737/2023 dated 18.09.2023. Also refer news article published in Down-to-earth titled “80% ground water in Punjab’s Malwa unfit for drinking” dated 27.07.2018 at Annexure A/7, Pg. 845-847 of IA No. 737/2023 dated 18.09.2023.
- XIV. CPCB ignored the fact that faecal contaminations are mainly caused due to poor sanitation.
- XV. CPCB report is inconclusive as it states further investigation required on 10 points making it inadmissible.
- XVI. Through 4 Committees the intent of the Government of Punjab was to generate tailored made reports. They failed miserably to hide the truth due to presence of historical data in respect to underground flow of water, death caused due to cancer in the affected areas, and death of animals due to presence of nitrate in fodder as per postmortem reports. Medical studies state that the Industry is not causing hepatitis B & C. Furthermore, there is an increase in agriculture productivity by usage of chemical fertilizers and pesticides, and decrease in ground water table due to excessive abstraction of ground water for wheat and rice.
- XVII. In arguments before this Hon’ble Court, the Government of Punjab stated that the environmental compensation shall be paid by the

Industry on the basis of principal of polluter pays for the loss to the environment. In this respect it is clearly stated that Industry cannot be attributed of any pollution as all the reports are in the favour of Industry. Pollution if any caused, is due to poor sanitation conditions due to absence of STPs, poor drainage systems, which is established by all agencies in their different reports, and presence of e-coli and f-coli. This establishes the Industry's stand with 100 % accuracy. It is the prime responsibility of the Government of Punjab to provide drinkable water to all natives and maintain working of the STP of the State.

XVIII. More over all the facts favour the industry and it did not damage the ground water as no contamination attributable to Industry was found, and no casualty was reported of any human being due to cancer or hepatitis. No death of animals was reported due to Industry and no agriculture productivity was damaged. When there is no damage to the ecology by the industry then there is no reason to impose environment compensation on the answering Respondent. Rather, strict action should be taken against the erring authorities for its failure to maintain law and order and protect the industry for running its legal operations.

Date: 07.12.2024

Place: New Delhi

DRWAN AND FILED BY:



Eisha Krishn, Sidharth Nayak,
Gitanjali Sanyal & Surya Gupta
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Email: eldflegal@gmail.com +91- 8851323704

SETTELED BY:

Shri Sanjay Upadhyay

[Senior Advocate]

3371

ANNEXURE R/1

Subject: Requirement of documents w.r.t. M/s Malbros International Pvt. Ltd., Zira
From: "zldmalbros ." <zldmalbros@oasisgrp.in>
Date: 03-10-2023, 15:14
To: "chairman.ptl.ppcb@punjab.gov.in" <chairman.ptl.ppcb@punjab.gov.in>, "chairmanppcb@yahoo.co.in" <chairmanppcb@yahoo.co.in>, "ppcbfdk@yahoo.com" <ppcbfdk@yahoo.com>
CC: "Sapankumar ." <sapankumar@oasisgrp.in>

To

The Chairman,
Punjab Pollution Control Board,
Head Office Vatavaran Bhawan,
Nabha Road, Patiala.

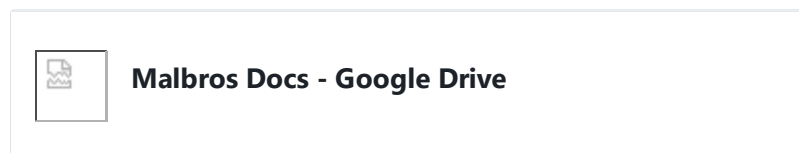
Subject: Letters dated 24/03/2023, letter no. 1332 (PPCB, Faridkot) wherein requirement of documents w.r.t. M/s Malbros International Pvt. Ltd., Zira, Ferozrepur, Punjab.

Reference: **CPCB letter no. CPCB/RD/VIP Ref/2023:388 dated 02.03.2023**

Respected Sir,

It is humbly submitted to your good self that the Central Pollution Control Board requested some documents from the Malbros International Pvt. Ltd, mentioned in CPCB report Annexure-1. Please find the documents related to information mentioned in Annexure 1 in CPCB report enclosed with this mail in google drive link.

[Malbros Docs - Google Drive](#)



Thanking You,
Yours faithfully,
For Malbros International Pvt. Ltd.

3372

Dr. Sapan Kumar
President Corporate Affairs
Oasis Group

-TRUE COPY-

3373

ANNEXURE R/2

Subject: Sealing/Closing of Dysfunctional Borewells
From: "zldmalbros ." <zldmalbros@oasisgrp.in>
Date: 31-05-2023, 17:59
To: "dc.frz@punjab.gov.in" <dc.frz@punjab.gov.in>
CC: "sapankumar@oasisgrp.in" <sapankumar@oasisgrp.in>

To
The Deputy Commissioner,
Ferozepur

Subject :- Regarding sealing/closing of Borewells

Respected Sir,

With due respect, as per CPCB visit to MALBROS INTERNATIONAL PVT. LTD in Feb 2023 they have directed to seal/close any dysfunctional/dead borewells in the premises.

Here is the list of borewells:-

Total number of borewells as per CPCB. = 10
Small domestic bores acquired with land = 4
Functional borewell = 3
Dysfunctional Borewell to be sealed = 3
Number of borewells approved = 4

Kindly seal the dysfunctional borewells in the plant premises.

Thanking you
Yours Sincerely

Nikhil Kumar
ZLD MANAGER
MALBROS INTERNATIONAL PVT ltd
Zira , Punjab

-TRUE COPY-



Service in Pubic Action Committee Vs. State of Punjab & Ors. [OA No. 606 of 2022/PB]

1 message

ELDF <eldflegal@gmail.com>

Sat, Dec 7, 2024 at 2:22 PM

To: kawalpreet303@yahoo.in

Cc: Eisha Krishn <eisha@eldfindia.com>, Surya Gupta <surya@eldfindia.com>, Gitanjali Sanyal <gitanjali@eldfindia.com>

Dear Sir,

Please find the attached copy of the Preliminary Rebuttal on behalf of the Respondent No. 7, M/s Malbros International Pvt. Ltd.

Thanks & Regards

--

Sameer Manher

Clerk

Enviro Legal Defence Firm

29, Presidential Estate LGF,

Nizamuddin East New Delhi – 110013

Ph. No. 011-40573181

**Rebuttal- Malbros.pdf**

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